

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BEHAVIORAL HEALTH INDUSTRY
NEWS, INC. D/B/A OPEN MINDS,

Plaintiff,

v.

MENTAL HEALTH SYSTEMS, INC.,

Defendant.

Civil Action

No.: 1:16-cv-01874-CCC

**DECLARATION OF JAMES C. CALLAGHAN JR. IN SUPPORT OF
DEFENDANT'S MOTION TO DISMISS FOR LACK OF PERSONAL
JURISDICTION OR, IN THE ALTERNATIVE, TO TRANSFER THIS
CASE TO THE SOUTHERN DISTRICT OF CALIFORNIA**

I, James C. Callaghan Jr. declare as follows:

1. I am the President and Chief Executive Officer ("CEO") of Mental Health Systems, Inc. ("MHS.") I have been a MHS board member since October 2008. I served as chairman of the MHS board from October 2010 to October 2015. I have personal knowledge of the facts I state below except where they are stated on information and belief. If called upon by this Court, I could competently testify as follows:

2. MHS is a non-profit California corporation founded in 1978 to improve the lives of individuals, families and communities facing substance abuse and behavioral health challenges. MHS provides mental health and drug and

alcohol rehabilitation services to California residents throughout Southern and Central California. It operates approximately 70-75 programs throughout the state of California but mainly in the County of San Diego.

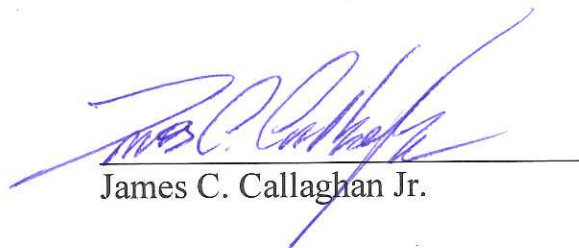
3. MHS's programs are mainly funded by San Diego County and also Riverside, Fresno, Santa Barbara, San Bernardino and Contra Costa Counties. MHS also receives some federal funding through the United States Department of Housing and Urban Development ("HUD") and through the various county contracts.

4. To the extent of my knowledge, MHS does not provide any services at all in Pennsylvania and does not receive any funding from the state of Pennsylvania.

5. From approximately 2007 until she was terminated in June 2016, Ms. Kimberly Bond was the President and CEO of MHS. Ms. Bond's husband, Mr. David Conn, was also an employee at MHS from approximately 1998 until he was terminated in June 2016.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed this 19th day of September 2016 in San Diego, California.


James C. Callaghan Jr.